

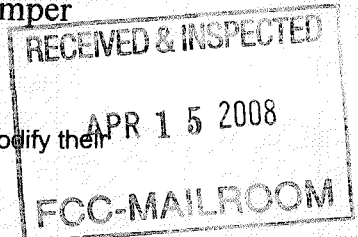
I agree with the statements in this report. See my signature on the last page. JEF 4-9-08 MB Docket No. 04-233

## Save Christian Radio

To Whom It May Concern: Please do not implement NPRM. JEF 4-9-08  
**FCC PROPOSALS COULD SILENCE CHRISTIAN RADIO STATIONS!**

Tell the FCC to keep **FREE SPEECH FREE** and not to tamper with Christian and religious programming!

The FCC is considering rule changes that could force Christian radio stations to either modify their messages or be forced from the air.



Although not directed specifically at those using the airwaves to disseminate the Good News of the Gospel, potential rule changes could put Christian Broadcasters in an untenable position. If enacted, the proposals could force Christian radio programmers to either compromise their messages by including input from those who don't share the same values, or to run the risk of costly, long and potentially ruinous government inquiries.

**PROPOSAL:** Specifically, the FCC is considering a proposal that would force every radio station to take programming advice from community advisory boards broadly representative of an area's population. That means that Christian broadcast stations could be forced to take programming advice from people whose values are at odds with the Gospel! A well organized group of atheists, abortionists or secular humanists could demand representation – and have standing to cause trouble at the FCC if they were turned away.

**RESULT:** Any Christian Broadcaster who stands up to the pressure and refuses to compromise on matters of conscience, could find his or her station's license renewal tied up for many years as the FCC considers complaints and allegations over nothing more than the station's chosen broadcast message!

**PROPOSAL:** Among the proposed new regulations are requirements that stations report, every three months, how much programming of various types has been broadcast, who produced it, and how it reflects the interests of a cross-section of local residents – even those who do not share Gospel values.

**RESULT:** If enacted, such requirements will give Christian Radio's opponents powerful new tools to harass and possibly silence Gospel inspired voices. Armed with these reports, adversaries can file complaints with the FCC against Christian Broadcasters who refuse to compromise on Gospel principles; any Christian Station that insists on only pure Gospel programming could be made to pay a high price for its refusal to yield airtime to those with other messages.

**PROPOSAL:** One proposed variation would even force stations to grant a certain amount of airtime to any group that requests it – much like cable television systems make time available on "public access channels."

# Save Christian Radio

**RESULT:** But unlike public access channels, which were created as a kind of open public forum, Christian Radio is a combination of pulpit and mission. The government cannot force messages from any pulpit, nor insist that missionaries promulgate viewpoints contrary to the Gospel. The same way, it should not be forcing Christian Radio stations to deliver the messages promulgated by secular humanists, abortionists or atheists.

**RESULT:** The FCC is also considering ways it could increase its coercive powers to force speech on unwilling broadcasters. Even a station that avoided sanctions during a typical eight-year license term could find its license renewal challenged.

While this has long been true, in recent years, the delays caused by these challenges were usually more of a nuisance than a disaster, as skilled civil service professionals worked through issues. These government experts had authority to apply reason, and ultimately granted almost every renewal presented.

**PROPOSAL:** But the FCC is considering a renewal processing procedure that would take renewal-granting power out of the hands of qualified civil servants when a Christian station, in good conscience, has kept its message pure and not allowed its facilities to be used to promulgate other messages. Instead of routine processing by civil servants, such a station's renewal application will be subject to the often multi-year process of review by the politically-appointed FCC commissioners.

**RESULT:** Not only will such a designation make a license renewal more time-consuming, but also more costly to obtain; Christian Broadcasters facing such a process will likely need greater assistance from lawyers and other consultants – added expenses that could prove ruinous.

**PROPOSAL:** Finally, the FCC is also proposing to drive up the costs of providing Christian Broadcasting services by eliminating labor-saving technological enhancements that make it possible to operate radio stations, at least part of the time, without an employee on the premises.

**RESULT:** Although such un-staffed operations have been the norm for years, the FCC is considering a rule to require staffing whenever a radio station is on the air – even if all the programming at that time is delivered by satellite. God's love may be free to all, but getting the word out will become even more expensive – perhaps too expensive for some radio stations.

**PROPOSAL:** The FCC is also considering a proposal that would force many Christian stations to relocate their main studio facilities.

# Save Christian Radio

RESULT: Now, it is possible to serve several missions from one location. But under this proposal, many co-location arrangements would be forced to end – raising daily operating costs and imposing immediate expenses related to moving, construction of other facilities and overseeing forced relocations.

RESULT: When coupled with the rapidly rising costs of broadcasting, including multiplying electricity expenses, extended staffing requirements and forced relocations will leave some Christian Broadcasters with little choice: either cut back or give up.

The First Amendment protects the free exercise of religion. The government must not be allowed to impose rules that violate it. Christian Radio needs your support now to keep its message of salvation strong on the nation's airwaves. It's not just a Christian thing – everyone's fundamental constitutional rights are at stake.

## HERE'S WHAT YOU CAN DO:

The FCC is taking comments on these proposals. You can add your comments to the record. The FCC can only make rule changes based on evidence – and the evidence you submit can make a difference!

By Mail: Send a letter, specifying what the FCC must not do and why. Make sure you place the docket number on top of the letter to be sure it is delivered to the correct office:

MB Docket No. 04-233, Comments in Response to Localism Notice of Proposed Rulemaking.

Mail your comments, so they arrive by April 14, 2008 to

Using the US Postal Service:

The Secretary

Federal Communications Commission

445 12th Street, SW

Washington, DC 20554

Attn: Chief, Media Bureau.

Or using FedEx, UPS, DHL or similar services:

The Secretary

Federal Communications Commission

9300 East Hampton Drive

Capitol Heights, MD 20743

Attn: Chief, Media Bureau

By Internet: Visit <http://www.savechristianradio.com> for easy step-by-step comment submission assistance.

You can also write to your Senators and Congressman. Tell them that freedom of religion and freedom of speech are threatened. Describe the problematic FCC proposals and the harm they will cause, if they are adopted. For help locating your Senators and Congressman – visit <http://www.savechristianradio.com>

**Comments in Response to Localism Notice of Proposed Rulemaking  
MB Docket No. 04-233**

I submit the following comments in response to the Localism Notice of Proposed Rulemaking (the "NPRM"), released Jan. 24, 2008, in MB Docket No. 04-233.

Any new FCC rules, policies or procedures must not violate First Amendment rights. A number of proposals discussed in the NPRM, if enacted, would do so – and must not be adopted.

(1) The FCC must not force radio stations, especially religious broadcasters, to take advice from people who do not share their values. The NPRM's proposed advisory board proposals would impose such unconstitutional mandates. Religious broadcasters who resist advice from those who don't share their values could face increased harassment, complaints and even loss of license for choosing to follow their own consciences, rather than allowing incompatible viewpoints to shape their programming. The First Amendment prohibits government, including the FCC, from dictating what viewpoints a broadcaster, particularly a religious broadcaster, must present.

(2) The FCC must not turn every radio station into a public forum where anyone and everyone has rights to air time. Proposed public access requirements would do so – even if a religious broadcaster conscientiously objects to the message. The First Amendment forbids imposition of message delivery mandates on any religion.

(3) The FCC must not force revelation of specific editorial decision-making information. The choice of programming, especially religious programming, is not properly dictated by any government agency – and proposals to force reporting on such things as who produced what programs would intrude on constitutionally-protected editorial choices.

(4) The FCC must not establish a two-tiered renewal system in which certain licensees would be automatically barred from routine renewal application processing. The proposed mandatory special renewal review of certain classes of applicants by the Commissioners themselves would amount to coercion of religious broadcasters. Those who stay true to their consciences and present only the messages they correspond to their beliefs could face long, expensive and potentially ruinous renewal proceedings.

(5) Many Christian broadcasters operate on tight budgets, as do many smaller market secular stations. Keeping the electricity flowing is often a challenge. Yet, the Commission proposes to further squeeze niche and smaller market broadcasters, by substantially raising costs in two ways: (a) by requiring staff presence whenever a station is on the air and, (b) by further restricting main studio location choices. Raising costs with these proposals would force service cutbacks – and curtailed service is contrary to the public interest.

We urge the FCC not to adopt rules, procedures or policies discussed above.

James E. Logue  
Signature

James E. Logue  
Name

Mr.  
Title (if any)

\_\_\_\_\_  
Organization (if any)

4 - 9 - '08  
Date

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\_\_\_\_\_  
Phone



APR 15 2008

# **Christian Radio Needs**

## **You**

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Attn: Chief, Media Bureau.

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We urge the FCC not to adopt rules, procedures or policies discussed above.

Bretta Pipes

4-10-08

Signature and Date

Bretta Pipes

1572 Kite Rd Millers Creek,

Name and Address

NC 28651

**Mail By April 14, 2008 to:**

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Federal Communications Commission

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Sherrie Joines 4-10-08  
Signature and Date

Sherrie Joines 258 Evans Lane, Wilkesboro, NC 28697  
Name and Address

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